

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CHARLENE CARTER,	§	
	§	
	§	
Plaintiff,	§	Civil Action No. 03:17-cv-02278-S
v.	§	
	§	
SOUTHWEST AIRLINES CO., AND	§	
TRANSPORT WORKERS UNION	§	
OF AMERICA LOCAL 556,	§	
	§	
Local 556s.	§	

**PLAINTIFF’S UNOPPOSED MOTION TO
EXTEND DEADLINE FOR COMPLIANCE WITH THE MAGISTRATE’S ORDER**

TO THE HONORABLE JUDGE OF SAID COURT:

Defendant Transport Workers Union of America Local 556 (“Defendant” or “TWU Local 556”), by and through their undersigned counsel, requests that the Court grant a one “working day” extension to comply with the Discovery Order of the U.S. Magistrate Judge (Doc. 99), extending the deadline from **July 31, 2020 to August 3, 2020**. In support of this motion, Defendant states as follows:

1. On **June 23, 2020**, United States Magistrate Judge Rebecca Rutherford issued her Discovery Order (Doc. 99) requiring (1) Defendant to produce documents for *in camera* review pertaining to a dispute over Defendant’s assertions of the work product privilege; and (2) Defendant produce an amended privilege log to Plaintiff. Plaintiff now seeks an extension of their Friday **July 31, 2020** deadline to Monday **August 3, 2020**.
2. Defendants counsel conferred via phone and email with Plaintiff’s counsel, Matthew Gilliam, who is unopposed to the extension.

3. Documents needed to comply with the Order reside at Defendant's attorneys' law offices. Defendant's attorneys' law office is a shared working space that has been functionally closed since the middle of March, 2020. Upon arriving at the office this morning, counsel for Defendant encountered several maintenance men working in the common spaces of the building without state mandated safety precautions. The workers were not wearing masks or gloves. Due to familial health concerns, specifically an infant and immune compromised elderly individual within his household, counsel did not feel comfortable entering the building. Counsel also does not have authority to remove the maintenance workers from the premises as it is a shared working space and not owned by counsel.
4. The following demonstrates there is good cause to grant the extension. This motion is not filed for the purpose of delay, but so that justice and safety may be done.
5. For the foregoing reasons, the Parties require and request additional time to comply with the Magistrate's Order.

Respectfully submitted,

Date: July 31, 2020

/s/ Adam S. Greenfield

Adam S. Greenfield
Texas Bar No. 24075494
agreenfield@candglegal.com
*Board Certified in Labor & Employment Law
by the Texas Board of Legal Specialization*

Edward Cloutman, III – Of Counsel
State Bar No. 04411000
crawfishll@prodigy.net

Cloutman & Greenfield, PLLC
3301 Elm Street
Dallas, Texas 75226
214.939.9224
214.939.9229 FAX

COUNSELS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I undersigned hereby certifies that on July 31, 2020, a true and correct copy of the foregoing document was served via the ECF notification on Defendant's counsel of record.

/s/ Adam S. Greenfield _____
Adam S. Greenfield

CERTIFICATE OF CONFERENCE

Defendant's counsel, Adam S. Greenfield, conferred via email with Plaintiff's counsel, Matthew Gilliam, on July 31, 2020. Mr. Gilliam expressed that Defendants did not oppose the motion.

/s/ Adam S. Greenfield _____
Adam S. Greenfield